



A CMS Energy Company

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Dockets Facility
U.S. Department of Transportation
Room PL-401
400 Seventh Street, SW
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RE: Docket No. RSPA-98-4957; Notice 2
Extension of Existing Information Collections: Comment Request
National Pipeline Mapping System

Consumers Energy Company serves more than 1.5 million customers in Michigan. We operate more than 23,000 miles of distribution main and more than 2,400 miles of transmission pipelines, as defined in 49 CFR 192.3. In 1999, we delivered 389 billion cubic feet of natural gas.

Consumers Energy is concerned with the practicality and accuracy of the National Pipeline Mapping System (NPMS) transmission pipeline location information in relation to the landbase being used. The proposed landbase is accurate to within only 500 ft. This may present a problem in metropolitan areas where transmission lines may run through subdivisions and along public ROWs. At this accuracy, it would be easy to misinterpret the location of a pipeline in relation to other important geographic features.

Furthermore, we believe OPS's estimated burden of 20 hours per operator for submitting the information is very low in comparison with our estimate to submit such records. We are currently in the process of converting transmission records from paper to CAD format, with the move to a GIS format planned for the future. In the current format, we estimate it would require more than 200 hours to assemble and process the transmission line information for submittal to OPS. Following the conversion to a GIS format, the submittal should be much shorter.

We appreciate the opportunity to provide comments on this docket.

KLElenbaas

CC: PNPreketes, Royal Oak
DJCarter, Lansing